

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LHF PRODUCTIONS, INC.,	)	
	)	
Plaintiff,	)	Case No.: 16-cv-3897
	)	
v.	)	
	)	Judge Sara L. Ellis
DOES 1 – 27,	)	
	)	
Defendants.	)	

**INITIAL STATUS REPORT**

Pursuant to the Court’s Minute Order of May 11, 2016, Plaintiff’s counsel submits this Initial Status Report, solely prepared by Plaintiff’s counsel because no counsel for a Defendant has filed an appearance.

1. Nature of the Case

A. Attorneys of Record. Plaintiff’s attorneys of record are Michael A. Hierl (Lead Trial Attorney), Todd S. Parkhurst and Mark A. Cisek.

B. No Defendant has been served yet. Plaintiff received the names/addresses of most of the Defendants from Comcast on May 3, 2016. See 2.C.

C. Basis of Federal Jurisdiction. This Court has subject matter jurisdiction over Plaintiff’s claims for copyright infringement pursuant to 17 U.S.C. §101 et seq. and 28 U.S.C. §§1331 and 1338(a).

D. Plaintiff’s Claims. Plaintiff alleges that Defendants infringed its exclusive rights in the copyrighted motion picture at issue by computer-based peer-to-peer file transfer. In particular, Plaintiff alleges that Defendants used a BitTorrent file transfer protocol to reproduce and distribute the copyrighted motion picture to and among third parties. No answer has been filed and no counterclaims are pending.

E. Relief Sought by Plaintiff. Judgment against Defendants for willful violation of Plaintiff's federally registered copyright, actual or statutory damages, an order of impoundment concerning all infringing copies of Plaintiff's copyrighted work in Defendants' possession or control, attorney fees, litigation expenses and costs, and such further declaratory and injunctive relief as may be just and proper.

F. Major Legal and Factual Issues. Whether or not each Defendant has infringed the federally registered copyright in the copyrighted motion picture at issue and the appropriate damages for that infringement.

2. Case Plan

A. Motions. Plaintiff's Motion for Leave to Take Discovery Prior to Rule 26(f) Conference was granted on May 11, 2016. No motions are pending.

B. Anticipated Response by Defendants. At present, Plaintiff does not know whether or not any Defendant will file any motion in response to the complaint or otherwise.

C. Discovery. Subpoenas were served on Comcast, the relevant Internet Service Provider (ISP), and a response was received from Comcast on June 23, 2016. As a result, the names of most of the Defendants are known to Plaintiff at this time. Each Defendant is also known to Plaintiff by the Internet Protocol ("IP") address assigned to that Defendant by the respective ISP and the date and the time when the infringing activity of each Defendant was observed (see Exhibit B to the Complaint). Plaintiff has used geolocation technology to trace the IP addresses of each Defendant to a point of origin within the State of Illinois. All discovery to the defendants, including Rule 26(a)(1) disclosures, will be completed after an amended complaint is filed in this action identifying the Doe Defendants by name.

D. Trial. Plaintiff has requested a jury trial, which would probably last 2-4 days.

3. Settlement.

A. Settlement discussions are ongoing with multiple Defendants on an anonymous basis. Five Defendants have been dismissed at this point.

B. Plaintiff does not believe that a settlement conference would be productive at this time.

4. Consent to Proceed Before a Magistrate Judge

A. Plaintiff consents to proceeding before a Magistrate Judge. However, no counsel for any Defendant has filed an appearance.

Respectfully submitted,

Dated: August 11, 2016

LHF PRODUCTIONS, INC.

By: s/ Michael A. Hierl  
Michael A. Hierl (Bar No. 3128021)  
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LHF Productions, Inc.

**CERTIFICATE OF FILING**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Initial Status Report was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on August 11, 2016.

s/Michael A. Hierl